

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2017-207-E

In the Matter of:	)	
	)	
	)	
Friends of the Earth and Sierra Club,	)	PETITION TO INTERVENE
Complainant/Petitioner v. South	)	
Carolina Electric & Gas Company,	)	
Defendant/Respondent	)	
	)	

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The South Carolina Coastal Conservation League (“CCL”) hereby petitions the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R. 103-825 of the Commission’s rules. In support of this petition, Petitioner states as follows:

1. On June 22, 2017, Friends of the Earth and Sierra Club filed a complaint requesting that the Commission initiate a formal adjudicatory proceeding to: a) determine the prudence of South Carolina Electric and Gas Company’s (“SCE&G”) recent acts or omissions in connection with building two new nuclear units at the V.C. Summer plant, b) determine the prudence of abandoning the units as well as the prudence of available least-cost efficiency and renewable energy alternatives, and c) require SCE&G to remedy, abate, and make reparations for unjust and unreasonable rates charged to ratepayers for the new units.

2. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. CCL promotes the implementation of comprehensive local, state, and federal energy policies related to renewable energy, energy efficiency, and climate change. CCL has members in South

Carolina who receive electricity service from SCE&G and are subject to the impacts of SCE&G's resource decisions.

3. CCL has participated in numerous prior proceedings related to, among other things, SCE&G's resource planning and energy efficiency programs. CCL seeks to intervene in this proceeding to ensure that its members' interests in promoting clean energy resources are represented.

4. CCL has not yet formulated its position in this proceeding, and plans to present its position in prefiled testimony.

5. CCL is represented by the following counsel in this proceeding:

J. Blanding Holman, IV  
Southern Environmental Law Center  
463 King Street, Suite B  
Charleston, SC 29403  
Telephone: (843) 720-5270  
Fax: (843) 414-7039  
bholman@selcsc.org

WHEREFORE, CCL prays that it be allowed to intervene in this matter.

Respectfully submitted this 3<sup>rd</sup> day of July, 2017.

s/ J. Blanding Holman, IV  
SC Bar No. 72260  
Southern Environmental Law Center  
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Charleston, SC 29403  
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*Attorney for Petitioner South Carolina Coastal  
Conservation League*

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In the Matter of:	)	
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Friends of the Earth and Sierra Club,	)	CERTIFICATE OF SERVICE
Complainant/Petitioner v. South	)	
Carolina Electric & Gas Company,	)	
Defendant/Respondent	)	
	)	

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I certify that the following persons have been served with one (1) copy of the foregoing Petition to Intervene by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

K. Chad Burgess  
South Carolina Electric & Gas Company/SCANA Corporation  
MC C222  
220 Operation Way  
Cayce, SC 29033-3701

Shannon B. Hudson  
Jeffrey M. Nelson  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201

Robert Guild  
314 Pall Mall  
Columbia, SC 29201

This 3<sup>rd</sup> day of July, 2017.

s/ Rachel Pruzin